

ERIC W. SWANIS, ESQ.  
Nevada Bar No. 6840  
GREENBERG TRAURIG, LLP  
10845 Griffith Peak Drive, Suite 600  
Las Vegas, Nevada 89135  
Telephone: (702) 792-3773  
Facsimile: (702) 792-9002  
Email: [swanise@gtlaw.com](mailto:swanise@gtlaw.com)  
*Counsel for Defendants*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

ROBERT BURAN,

Plaintiff,

v.

C. R. BARD, INC. and BARD PERIPHERAL  
VASCULAR, INC.,

Defendants.

CASE NO. 2:20-cv-00608 -APG-BNW

**STIPULATION AND ORDER TO STAY CASE**

The parties, Plaintiff ROBERT BURAN and Defendants, C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (“Bard”), by and through their undersigned counsel, hereby stipulate as follows pursuant to Fed. R. Civ. P. 15(a)(2):

WHEREAS, Plaintiff’s counsel represents approximately 400 plaintiffs with cases proceeding in this and other courts across the country asserting similar claims against Defendants for injuries they contend arise out of their use of Defendants’ IVC filters; and

WHEREAS, Plaintiff’s counsel and Defendants have begun discussions in an attempt to achieve a global settlement of the cases and claims of the plaintiffs represented by Plaintiff’s counsel; and

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1 WHEREAS, Defendants have retained a dedicated settlement counsel for these  
2 discussions which has successfully resolved thousands of similar cases with other counsel  
3 representing similar plaintiffs;

4 WHEREAS, Plaintiff's counsel has extensive experience in IVC filter litigation both  
5 prior to and in the course of the MDL; and

6 WHEREAS, based on all the facts and circumstances, including, but not limited to, the  
7 prior success of Defendants' settlement counsel in resolving similar cases and Plaintiff's  
8 counsel's experience with Defendants in prior IVC filter litigation, Plaintiff's counsel believes  
9 that there is a good likelihood that the global settlement talks with Defendants will be  
10 successful; and

11 WHEREAS, as part of the agreement to engage in global settlement discussions,  
12 Plaintiff's counsel and Defendants have agreed that all activity in all of the Plaintiff's  
13 counsel's IVC filter cases should "stand-down" for 60 days so that the Parties may focus their  
14 attention on their settlement efforts; and

15 WHEREAS, the ongoing national emergency surrounding the Covid-19 pandemic  
16 have heightened the need for all parties to conserve their resources as much as possible;

17 IT IS STIPULATED AND AGREED BY THE PARTIES that all activity in this case  
18 shall be stayed through and including **June 26, 2020**.

19 IT IS FURTHER STIPULATED AND AGREED BY THE PARTIES that the current  
20 deadline to file the Joint Status Report, currently set for **April 30, 2020** should be continued  
21 to **July 7, 2020**;

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1 IT IS FURTHER STIPULATED AND AGREED BY THE PARTIES that the deadline  
2 to file the Verified Petition, Motion for Permission to Practice, currently set for **May 15, 2020**  
3 should be continued to **July 15, 2020**

4 RESPECTFULLY submitted this 30<sup>th</sup> day of April 2020.

5 DALIMONTE RUEB STOLLER, LLP

GREENBERG TRAURIG, LLP

6 By: /s/ Greg Rueb

By: /s/ Eric W. Swanis

7 GREGORY D. RUEB, ESQ.  
8 (CA SBN 154589)  
9 515 S Figueroa Street, Suite 15505  
10 Los Angeles, California 90071  
11 Telephone: (949) 375-6843  
[paul@drlawllp.com](mailto:paul@drlawllp.com)  
[greg@drlawllp.com](mailto:greg@drlawllp.com)  
12 *Counsel for Plaintiff*

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*Counsel for Defendants*

### 13 **ORDER**

14 The Court, having reviewed the stipulation of the Parties, and good cause appearing  
15 therefore:

16 IT IS HEREBY ORDERED ADJUDGED AND DECREED that all activity in this  
17 case shall be stayed through and including **June 26, 2020**.

18 IT IS FURTHER HEREBY ORDERED ADJUDGED AND DECREED that the  
19 current deadline to file the Joint Status Report, currently set for **April 30, 2020** should be  
20 continued to **July 7, 2020**;

21 IT IS FURTHER HEREBY ORDERED ADJUDGED AND DECREED that the  
22 deadline to file the Verified Petition, Motion for Permission to Practice, currently set for **May**  
23 **15, 2020** should be continued to **July 15, 2020**.

24 **IT IS SO ORDERED.**

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27 UNITED STATES DISTRICT JUDGE  
28 Dated: May 5, 2020.

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